

In The United States District  
Court For The Eastern District  
Of Pennsylvania

United States of America,  
Plaintiff  
Vs.

Khalif Miller,  
Defendant

Case No. 2:20-cr-00368  
-JCS

Motion to remove  
& appoint counsel  
& return of retainer

COMES NOW the defendant, Khalif Miller, Pro Se, and hereby motion to remove and appoint Counsel provided by the courts. Also, For counsel, Worrell D. Nero, to return retainer fee. Defendant presents the following FACTS to the courts:

1. Respondent's attorney, Worrell D. Nero, has refused respondent's wishes to represent respondent effectively or according to respondent objectives. Counsel has unilaterally made all decisions without the freely-given, FULLY informed consent of the respondent.

2. Respondent's attorney has not discussed the case with the respondent since he was retained, and has not visited the respondent since counsel

refuses to speak over the phone.

3. Respondent's attorney has shared pieces of the respondent discovery with a third party without the consent of the respondent, breaching the duty of counsel.
4. Counsel has withheld the respondent's discovery from the respondent
5. Respondent's attorney has provided false information about the proceeding of the respondent's court hearings.
6. If the courts allows the respondent's counsel to proceed representing the respondent and refuses to appoint counsel for the respondent in spite of the fact that the respondent is still willing to work with an attorney, the respondent objects that this will be a denial of due process. The problem here is not that the respondent is intractable, but the attorney is. Respondent's request have been legal and ethical. This has resulted in a denial of the respondent's right to due process. If Counsel is unwilling to do more than merely appear in court, than counsel should not accept the contract to represent the respondent

and the court should not allow his appointment in that capacity.

7. The Respondent is indigent and cannot afford to hire an attorney.

8. The respondent is ignorant of the laws of the court rules and of court procedure's. If the court expects the respondent to either represent himself or accept an inadequate counsel it would be a denial of due process.

Respectfully Submitted this 19<sup>th</sup> day of October, 2021

Khalif Miller  
Khalif Miller

## Certificate of Service

I, Khalif Miller, Do hereby certify that I have caused a copy of the withire motion to be delivered via the Prison Inmate Mailbox System to the following parties on this date:

Clerk of Courts (EDPA)  
601 Market St.  
Phila, PA 19106

The Government shall recieve it's copy through the courts ECF System

Date: 10/19/2021

Khalif Miller  
Khalif Miller



PHILADELPHIA PA 190  
21 OCT 2021 PM 5 L

Khalif Miller  
Reg#70042016  
FDC Phila  
P.O. Box 562  
Phila, PA 19105



Clerk of Courts(EDPA)  
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Philadelphia, PA 19106

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